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Before  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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MAY 28 1993

IN THE MATTER OF: )

Replacement of Part 90 by Part 88 to )  
Revise the Private Land Mobile Radio )  
Services and Modify the Policies )  
Governing Them )

FCC - MAIL ROOM

PR Docket 92-235

COMMENTS

of the

TEXAS DEPARTMENT OF PUBLIC SAFETY

Respectfully submitted,

*James R. Wilson*

Colonel James R. Wilson  
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Texas Department of Public Safety  
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To The Commission:

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COMMENTS OF THE TEXAS DEPARTMENT OF PUBLIC SAFETY

exclusivity, consolidation of the current 20 radio services, new technical and operational standards, rules permitting centralized trunking, channels for specific operational characteristics, channels for new high-technology operation, and simpler rules. The following comments on PR Docket 92-235 are submitted for your consideration.

#### CHANNEL BANDWIDTH AND IMPLEMENTATION:

Frequency assignment in the 150 MHz VHF band at 15 kHz increments with present technology equipment is possible only with geographic separation. The limiting factor with current equipment is not transmitter deviation, but receiver bandwidth.

`At the very least, consideration should be given to pairing the newly created public-safety frequencies for repeater operation. Without structured frequencies for repeater pairs the advantages and spectrum efficiency of trunking cannot be realized.

#### WIDE AREA COVERAGE AND EXCLUSIVITY:

The Texas Department of Public Safety has law enforcement jurisdiction for 267,000 square miles. To maintain an efficient statewide law enforcement capability we must have the ability to move officers with compatible equipment to any area of the state on short notices. To effectively communicate we then need exclusive frequencies on a statewide basis. For this agency, statewide exclusive use frequencies would provide more spectrum efficiency than the proposed assignment methodology.

#### Recommendation:

Provide for state police only frequencies on a statewide basis as is now authorized under Part 90.

#### POWER AND HEIGHT LIMITATION:

The proposal to reduce effective radiated power based on antenna height will adversely affect the Department of Public Safety. Providing wide area communications to Department of Public Safety officers throughout the State of Texas with the power limitations proposed will require a substantial increase in communications sites. Increasing the number of sites needed to maintain our current coverage will add significant additional financial burdens to the taxpayers of the state. Additional sites will require additional frequencies, thereby reducing spectrum efficiency.

Recommendation:

Adopt a plan similar to 821 MHz NPSPAC for maximum signal level at the edge of the area of jurisdiction.

INTERLEAVING NONPUBLIC-SAFETY USERS ON EVERY THIRD CHANNEL IN THE 150 MHz BAND:

Present crowding of the public-safety 150 MHz VHF band produces extensive interference. In some cases, the affected agencies are able to tolerate the interference. In other cases, because of the severity of the interference, agencies are forced to flee to the higher bands to obtain relief. Some agencies, including the Texas Department of Public Safety, have successfully negotiated with other affected agencies to eliminate or reduce interference to acceptable levels. In all cases, communications and negotiations with related public safety agencies whose primary responsibilities are to provide emergency